

RE: NIKOLAY G TANCHEV  
RADA I TANCHEV

) Case No. 15 B 42606  
)  
debtors ) Chapter 13  
)  
) Judge: JACK B SCHMETTERER

**NOTICE OF MOTION**

NIKOLAY G TANCHEV  
RADA I TANCHEV  
2206 S SCOTT ST  
DES PLAINES, IL 60018

SULAIMAN LAW GROUP LTD  
via Clerk's ECF noticing procedures

Please take notice that on April 20, 2016 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on February 24, 2016.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO FILE  
REQUIRED DOCUMENTS UNDER SECTION 521 (a) (1)**

Now comes Tom Vaughn, Trustee in the above entitled case and moves this Honorable Court to dismiss this case for cause pursuant to 11 U.S.C. § 1307 (c) and in support thereof states as follows:

1. That the Debtors filed the current petition for relief on December 17, 2015.
2. That the above-captioned plan has not yet been confirmed .
3. Debtor has failed to file the following documents within 14 days of filing the petition;

Debtor has failed to provide pay advices

4. 11 U.S.C. §521 (a) (1) requires the debtor to file specified documents .
5. Rule 1007 (c) Rules of Bankruptcy Procedure require that certain documents be filed with the petition, or within 14 days thereafter .

WHEREFORE, the Trustee requests that this court dismiss this case for cause under 11 U.S.C. § 1307 (c) and for any and all other relief this court deems just and proper .

Respectfully submitted,

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Tom Vaughn